REMARKS

Applicants appreciate the detailed examination evidenced by the Office Action. Claims 4-6, 8, 9, 11, 13, 14, and 16 have been amended, and Claims 1-3, 10, and 21-22 have been canceled. Applicants submit that the pending claims are patentable over Noah for at least the reasons provided below.

All of the pending claims are rejected under 35 U.S.C. §102(e) as anticipated by Noah.

The background section of the present application explains that "it is common for storage systems to optimize block layout on the physical media according to monitored disk access patterns", and that a storage system can include a "[u]sage monitor 310 [that] tracks which storage blocks are requested most often", and a "layout optimizer 320 [that] uses this data to optimize the layout of data on the physical devices 220." (Specification, page 4, lines 10-13, emphasis added). However, the specification explains that a potential "drawback to the prior art approach is that it relies on observed access patterns", and that in "complex systems, it can be compute [sic] intensive and error-prone to detect such patterns." (Specification, page 5, lines 3-4, emphasis added).

In contrast, Claim 6 has been amended to emphasize that a content authoring tool generates a plurality files along with hints that specify one or more of the files that are likely to be referenced within a temporal proximity of reference to a selected other one of the files. A storage system receives the plurality of files and hints from the content authoring tool, and uses the received hints to allocate storage therein for the files. More particularly, amended Claim 6 recites:

> 6.   A method of storing content in a computing network, comprising:
>   generating by a content authoring tool a plurality of files and hints that specify one or more of the files that are likely to be referenced within a temporal proximity of reference to a selected other one of the files;
>   receiving at a storage system the plurality of files and hints from the content authorization tool; and
>   using the received hints to allocate storage within the storage system for the files.

Noah appears to be no more relevant to amended Claim 6 than the description of prior art in the background section of the present application. In particular, Noah discloses a file access prediction process that "tracks the following information: Current Prediction - [which] is simply the first item observed to follow the current file. ... [and] Dynamic/Last-Successor - [which] ... is continuously updated with every access to a file to represent the dynamically observed last successor." (Noah, page 29, para. 2.3, emphasis added). Accordingly, the file access prediction process relies on observing access patterns to files. Noah further describes a shortcoming of such an observation approach in that its observations may need to occur over "a trace period of approximately one month .. [or] a longer trace period of a little over a year." (Noah, page 30, para. 3).

Nowhere does Noah disclose any one of the following recitations of Claim 6: 1) generating by a content authoring tool a plurality of files and hints that specify one or more of the files that are likely to be referenced within a temporal proximity of reference to a selected other one of the files; 2) receiving at a storage system the plurality of files and hints from the content authorization tool; and 3) using the received hints to allocate storage within the storage system for the files.

For at least these reasons, Applicants submit that Claim 6 is patentable over Noah.

Dependent Claims 4, 5, 7-9, and 11-19 are patentable at least per the patentability of independent Claim 6. Moreover, these claims are submitted to provide further basis for patentability.

For example, Claim 11 recites that the "hints are encoded in a markup language notation." The Office Action cites to page 32, para. 4, of Noah to reject Claim 11. However, the cited portion of Noah merely discloses that "overcom[ing] latency problems [has] increased interest in prefetching and predictive caching in such applications as web-proxies". Accordingly, Noah appears to describe that prefetching and predictive caching may be useful for retrieving web pages. Noah does not disclose that a content authoring tool generates hints encoded in a markup language notation that specify one or more of the files that are likely to be referenced
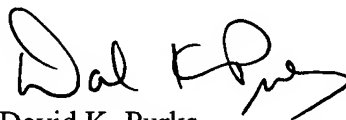
within a temporal proximity of reference to a selected other one of the files. For at least these reasons Claim 11 is submitted to be patentable over Noah.

Claim 12 recites that the hints are encoded in an Extensible Markup Language notation. As explained, Noah does not disclose that a content authoring tool can generate hints encoded in a markup language notation and, much less, does not disclose that such hints can be encoded in an Extensible Markup Language notation. For at least these reasons Claim 12 is submitted to be patentable over Noah.

CONCLUSION

In light of the above amendments and remarks, Applicants respectfully submit that the above-entitled application is now in condition for allowance. Favorable reconsideration of this application, as amended, is respectfully requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (919) 854-1400.

Respectfully submitted,

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